



4417 13th Street #317
Saint Cloud, FL 34769
Ph. (260) 622-5776
In U.S. (866) 317-2851

July 6, 2021

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: ***Rural Digital Opportunity Fund***
AU Docket No. 20-34 and WC Docket Nos. 10-90 & 19-126
Notice of Ex Parte Communication

Dear Ms. Dortch:

On July 1, 2021, Claude Aiken, President and CEO of the Wireless Internet Service Providers Association (“WISPA”), Louis Peraertz, the undersigned Vice President of Policy for WISPA, and Stephen Coran, WISPA outside counsel, met with Commissioner Nathan Simington and his staff to discuss the attached presentation. The Commissioner’s staff attending the meeting included Carolyn Roddy, Erin Boone, Adam Cassady, Michael Sweeney, and Isabella Russo-Tiesi.

During the meeting, Mr. Aiken discussed WISPA’s recently developed “Path to Gigabit” initiative. This initiative proposes a number of policy objectives that would help broadband service providers lead the effort to achieving the Gigabit future.

As discussed in the attached presentation, WISPA has supported, and continues to support, the Commission’s efforts to make broadband mapping more accurate and more granular. WISPA agrees with many policymakers and stakeholders who believe that developing accurate data about “where broadband is and is not” is a necessary first step before awarding subsidies to spur broadband deployment. This will be especially relevant as the Commission begins to consider the rules and procedures for Phase II of the Rural Digital Opportunity Fund.

Mr. Aiken also explained that, to connect all Americans to fast broadband speeds, symmetrical broadband speeds are not necessary. Consumers typically use at least eight times more download bandwidth than upload bandwidth. Therefore, data about consumer broadband usage does not support a subsidy policy that would mandate subsidizing 100/100 Mbps speeds at the exclusion of asymmetrical speeds that better reflect consumer usage. That consumer data also does not support policies that would foreclose certain competitive alternatives such as fixed wireless broadband services that may currently not offer 100/100 Mbps speeds. Moreover, fixed wireless broadband can be deployed much more quickly than wireline technologies and can be upgraded to provide faster download and upload speeds over time as equipment evolves to keep pace with any increase in consumer.



These conclusions are demonstrated by a recent member survey WISPA conducted that compared consumers' pre-COVID and current broadband experiences. These results are as follows:

	Pre-COVID	Current
Top 5 Broadband Uses	1. Email, Movie streaming 2. Gaming 3. Web browsing 4. Music streaming 5. Smart Home	1. Virtual meetings 2. Distance learning 3. Movie streaming 4. Telemedicine 5. Gaming
Most chosen/ popular package	10/1 Mbps	25/3 Mbps

In addition, survey respondents reported the following with respect to symmetric speeds:

- 69 percent reported that their download:upload ratio at peak is 8:1 or higher.
- 97 percent of survey respondents reported that their customers have not demanded symmetric speeds.
- 83 percent indicated that they do not expect their customers to request symmetric speeds in the next five years.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in above-referenced dockets. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Louis Peraertz

Louis Peraertz, Vice President of Policy

Attachment

cc: Hon. Nathan Simington
Erin Boone
Carolyn Roddy
Michael Sweeney
Adam Cassady
Isabella Russo-Tiesi



WWW.WISPA.ORG

WISPA Path to Gigabit Proposal





WISPs and their role in the marketplace

- WISPs bring broadband to customers through a combination of next generation wireless and fiber/gigabit technologies
- WISPs are typically small, self-funded businesses with fewer than 10 employees
- They range in size from fewer than 100 subscribers to nearly 200,000 subscribers
- There are over 2,800 WISPs, serving more than seven million Americans
- They predominantly serve unserved and underserved rural markets
- A growing number are urban and tribal-focused, too
- They can bring connectivity at a fraction of cost and time of traditional alternatives
- Their ethos: use the right tool for the right job; one-size-fits-all need not apply

These innovators are the reason why the digital divide is smaller today than it was 10 years ago. With smart policy solutions, Congress can harness the power of these companies to quickly deliver gigabit connectivity throughout the United States.

Here is a blueprint for policymakers to achieve just that.

WWW.WISPA.ORG





Bridging the digital divide via smart deployment, inclusion policy

- Millions of Americans are on the wrong side of our connected future
- All Americans need affordable broadband access to stay safe, thrive and participate in our society
- The cost of serving remote communities exacerbates the digital divide
- Speeds and symmetry on their own are not an answer to everything
- Futureproof is an all-of-the-above, open toolbox; not a one-size-fits-all approach
- Focusing on speeds and symmetry alone lock out diverse, open toolbox marketplace solutions

Tailored policy solutions can connect communities to affordable, futureproof broadband today without having to spend billions more over the next decade, delaying delivery of quality, high speed broadband to Americans who would have to wait years to receive it. WISPs build tomorrow's broadband solutions today, proving networks can be sustainable even in the toughest to reach places of America. Law and policy must work to include WISPs as a solution to the digital divide.





Localize spectrum policy to supercharge competition

- Allocate at least 200 megahertz of mid-band spectrum for coordinated, non-auctioned, high-powered, point-to-multipoint use, on either a shared or licensed-by-rule basis to serve suburban and rural America
- Allocate more millimeter wave spectrum available on a shared basis so that small, medium and large providers can use it to relieve congestion in urban areas
- Where auctions are desirable, mandate meaningful and accessible set-asides of spectrum – through such techniques as census tract or smaller bidding areas, smaller license blocks, bidding credits or other preferences, GAA access, etc. – for small providers
- Mandate “use it or share it” use for unused/fallow spectrum of government and commercial licensees
- Optimize lower spectrum bands to help connectivity go the distance

More accessible spectrum for diverse, smaller innovators means more connectivity in the hardest to serve parts of rural, suburban and urban America.



Develop subsidy programs that incentivize, leverage present providers

- Complete mapping data must be funded, developed and used to target Federal support for broadband deployment
- Support should focus on providing services today to those who lack broadband
- Support shall be technologically-neutral, based on an evolving level of broadband services deemed essential to education, public health and safety, and which have been subscribed to by a substantial majority of residential customers
- There shall be a presumption against government-subsidized overbuilding
- Preference for support shall be given to the small providers who can quickly deliver services to a majority of residential customers in a given area

Funding programs should recognize that as consumer demands evolve, so too will the networks that drive them. Leveraging local providers will result in significant savings today while still delivering evolutionary capabilities of the future.



Align infrastructure policy to unleash competition by small innovators

- More Federal, state, local, municipal and private infrastructure should be made available to broadband providers to lower costs, increase the speed of deployment
- More access also ensures network resiliency against natural or other emergencies
- Broadband providers shall not be required to gain Eligible Telecommunications Carriers status for access to infrastructure or to qualify for government programs
- All broadband providers should have non-discriminatory access to poles and rights of way, including access to cooperative and municipal facilities
- Require “dig once” rules for the installation of communications conduit during roadway construction and upgrades

With fast and fair access to infrastructure, broadband providers can ensure access for underserved and unserved communities, putting them on the road to gigabit connectivity now rather than years from now.





Achieve digital adoption, inclusion

- Adoption and access are two sides of same coin
- We must address the broadband needs of at-risk, marginalized or economically-disadvantaged rural, suburban and urban individuals/communities
 - Develop and promote low-income consumer reimbursement mechanisms
 - Fund the distribution of digital literacy programming
 - Target entities that are already on the ground doing meaningful work to expand access

Service affordability, digital literacy, and device access remain significant barriers to full participation in an increasingly digital world. Reducing these barriers makes sure the benefits of investing in futureproof deployment inures to all Americans.





A Path of Benefits

- Futureproof deployment is evolutionary deployment
- Deployment remains cost-effective, tax-payer friendly, sustainable
- Deployment occurs more rapidly
- Promotes a wider diversity of solutions and providers
- Enables the least able in society to get and stay online
- Accords with the arc of tech-neutral, evolutionary innovation
- Avoids technological asset lock-in and obsolescence

There is no one-size-fits-all solution to America's connectivity gap. From terrain to climate to the very bedrock they live and play upon, American communities are as different in their network deployment needs as the people who call these communities home. A federal policy framework that allows for a flexible, all-of-the-above approach to deployment will allow service providers to deploy the technology that best meets the needs of the communities they serve. This path to gigabit, and beyond, leverages today's communications landscape for the needs of tomorrow.





WWW.WISPA.ORG



7 Steps Congress Can Take To Get Broadband Here

1. Focus on communities that have no broadband first
2. Ensure subsidies favor no one technology over another
3. Promote a diversity of solutions and providers who can quickly deliver them
4. Leverage providers who already serve the hardest to reach
5. Provide more meaningful access to spectrum for small providers
6. Allow access to infrastructure for all broadband providers
7. Boost adoption by supporting digital literacy, device access and broadband access

About WISPA

WISPA's 1000 members are composed of fixed Wireless Internet Service Providers (WISPs) and the industry that supports fixed wireless broadband, including equipment suppliers, support services, and other components needed to run a successful business. Our members, and WISPs, in general, provide broadband access to millions of residential and business customers, often in exclusively rural areas.

